

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2:12-cv-02327**

**THIS DOCUMENT RELATES TO:**

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***Tammy Pizzitola v. C. R. Bard, Inc., et al.***      **Case No. 2:13-cv-00249**

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**DEFENDANT C. R. BARD, INC.’S REPLY IN SUPPORT OF ITS MOTION  
TO EXCLUDE OR LIMIT CERTAIN OPINIONS AND TESTIMONY  
OF KEITH REEVES, M.D.**

Defendant C. R. Bard, Inc. (“Bard”) hereby submits its Reply in Support of its Motion to Exclude or Limit Certain Opinions and Testimony of Keith Reeves, M.D. (the “Motion”). In support of its Motion, Bard respectfully shows the Court as follows:

On January 23, 2020, Bard filed its Motion. *See* ECF No. 9080. Pursuant to the scheduling order entered in *Pizzitola v. C. R. Bard, Inc., et al.*, Case No. 2:13-cv-00249 (*see* ECF No. 93) and Local Rule 7.1, Plaintiffs were required to file their response to the Motion on or before February 6, 2020. *See* L.R. 7.1(a)(7). Plaintiffs failed to do so. In addition, Plaintiffs did not seek an extension of time from either the Court or Bard to file their response to the Motion.

Bard respectfully requests the Court exclude or limit Dr. Keith Reeves’s opinions and testimony for the reasons expressed in the Motion and its accompanying memorandum. This Reply applies to *Pizzitola v. C. R. Bard, Inc., et al.*, Case No. 2:13-cv-00249, which adopted the general causation report of Dr. Reeves.

Dated: February 13, 2020

Respectfully submitted,

/s/ Mildred Segura

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Mildred Segura  
Mildred Segura